

[ORAL ARGUMENT HELD ON OCTOBER 15, 2024]

APPEAL NO. 24-5004

**UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF
COLUMBIA CIRCUIT**

Simon Ateba,
Plaintiff-Appellant,

v.

Karoline Leavitt, *et al.*,
Defendants-Appellees.

On Appeal from the United States District Court
for the District of Columbia

Case No. 1:23-cv-02321-JDB / Hon. John D. Bates

APPELLANT’S SUPPLEMENTAL DECLARATION

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SUPPLEMENTAL DECLARATION OF SIMON ATEBA

I, Simon Ateba, hereby declare:

1. I am the Plaintiff-Appellant in the above-captioned matter. I am above the age of 18, and I make this declaration from my own personal knowledge. If called upon to testify to the contents below, I could and would do so competently.

2. On January 28, 2025, I learned that the White House intended to restore the hard passes that were revoked in July / August 2023. That day, I emailed the White House Press Office regarding my former hard pass and asked when it would be restored. I also inquired about obtaining a day pass until my hard pass access was restored.

3. I did not receive a response to these requests.

4. On January 30, 2025, I emailed the White House Press Office requesting a copy of the application for a hard pass. The Press Office sent me a copy of the application that day. I was told I must fill the application out and submit it in person on the White House grounds.

5. That same day, the White House sent me a link to the day-pass system. I filled out the form for a day pass and submitted it to the White House. I did this so I could attend the press briefing that day and submit my hard pass application for processing.

6. When I arrived at the White House on January 30, 2025, I was not allowed inside. I emailed the White House Press Office to determine why I was not allowed inside. I was unable to get a clear explanation.

7. On January 31, 2025, I again requested access to the day pass system, but I was unable to obtain a day pass.

8. I have sent multiple additional emails to the White House Press Office requesting to attend briefings and submit my hard pass application. This includes most recently emails on February 4, 2025 and February 6, 2025.

9. Despite my persistence, I have not received a substantive response or a clear explanation for the lack of access.

10. I remain barred from fulfilling my reporting duties as White House Correspondent for Today News Africa.

11. Despite the lack of access, I am still seeking a hard pass to cover the Trump White House.

12. I intend to continue seeking access to a White House hard pass for the purpose of engaging in newsgathering even after President Trump leaves office.

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VERIFICATION

I, Simon Ateba, declare under penalty of perjury that the factual allegations in the foregoing **SUPPLEMENTAL DECLARATION OF SIMON ATEBA** are true and correct.

Executed this 12th day of February 2025

A handwritten signature in black ink, appearing to read 'Simon Ateba', is written over a horizontal line.

Simon Ateba

CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2025, I electronically filed the foregoing Certificate with the Clerk of the Court for the United States Court of Appeals for the District of Columbia Circuit by using the CM/ECF system, which will accomplish service on counsel for all parties through the Court's electronic filing system.

/s/ Josh Dixon

Josh Dixon

Attorney for Plaintiff-Appellant